

January 21, 2025

**BY ECF**

The Honorable Jeannette A. Vargas  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08808 (JAV)**

Dear Judge Vargas:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") and defendant Bad Boy Records, LLC.

The undersigned parties have agreed that the Combs Defendants and Bad Boy Records, LLC will accept service through the undersigned counsel of (1) the Complaint (ECF #1) and (2) the Plaintiff's Motion for Leave to Appear Anonymously (ECF #6, the "Anonymity Motion") in exchange for Plaintiff's consent to an extension of time to respond to each until **February 25, 2025**.

Consistent with this agreement, the undersigned parties respectfully request that the Court enter a scheduling order providing that (1) the Combs Defendants and Bad Boy Records, LLC shall have until **February 25, 2025** to answer, move, or otherwise respond to the Complaint; and (2) the Combs Defendants and Bad Boy Records, LLC shall have until **February 25, 2025** to file an opposition to the Anonymity Motion. No prior request for this relief has been made.

Respectfully submitted,

/s/ Mark Cuccaro

Mark Cuccaro  
SHER TREMONTE LLP  
90 Broad Street, 23rd Fl.  
New York, New York 10004  
T: 212.202.2600  
[mcuccaro@shertremonte.com](mailto:mcuccaro@shertremonte.com)  
*Counsel for the Combs Defendants*

/s/ Antigone Curis

Antigone Curis  
CURIS LAW, PLLC  
52 Duane Street, 7<sup>th</sup> Fl.  
New York, NY 10007  
(646) 335-7220  
[antigone@curislaw.com](mailto:antigone@curislaw.com)  
*Counsel for Plaintiff John Doe*

Hon. Jeannette A. Vargas

January 21, 2025

Page 2 of 2

/s/ Donald S. Zakarin

Donald S. Zakarin

PRYOR CASHMAN, LLP

7 Times Square

New York, NY 10036

212-326-0108

[dzakarin@pryorcashman.com](mailto:dzakarin@pryorcashman.com)

*Counsel for Defendant Bad Boy  
Records, LLC*